

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

THE MUNICIPALITIES OF BAYAMÓN,  
CAGUAS, LOÍZA, LARES,  
BARRANQUITAS, COMERÍO, CAYEY,  
LAS MARÍAS, TRUJILLO ALTO, VEGA  
BAJA, AÑASCO, CIDRA, AGUADILLA,  
AIBONITO, MOROVIS, MOCA,  
BARCELONETA, CAMUY, CATAÑO,  
SALINAS, ADJUNTAS, ARROYO,  
CULEBRA,  
DORADO, GUAYNABO, HORMIGUEROS,  
JUNCOS, LAJAS, MANATÍ, NAGUABO,  
NARANJITO, UTUADO, VILLALBA,  
COAMO, OROCOVIS, VIEQUES, and  
YABUCOA on behalf of themselves and  
others similarly situated, known as the  
MUNICIPALITIES OF PUERTO RICO,

Plaintiffs,

v.

EXXONMOBIL CORP, SHELL PLC F.K.A.  
ROYAL DUTCH SHELL PLC, CHEVRON  
CORP, BP PLC, CONOCOPHILLIPS,  
MOTIVA ENTERPRISES LLC,  
OCCIDENTAL PETROLEUM F.K.A.  
ANADARKO PETROLEUM CORP, BHP,  
RIO TINTO PLC, AMERICAN  
PETROLEUM INSTITUTE, XYZ  
CORPORATIONS 1-100, and JOHN AND  
JANE DOES 1-100,

Defendants.

Civil Case No. 3:22-cv-01550-SCC-HRV

Re:

Consumer Fraud; Deceptive Business  
Practices; Racketeer and Corrupt  
Organizations Act, 18 U.S.C. § 1962;  
Sherman Act, 15 U.S.C. § 1 et seq.; Public  
Nuisance; Strict Liability – Failure to Warn;  
Strict Liability – Design Defect; Negligent  
Design Defect; Private Nuisance; Unjust  
Enrichment

**JOINT MOTION FOR LEAVE TO FILE REPLIES AND ENLARGED JOINT REPLIES,  
AND FOR EXTENSION OF TIME TO FILE REPLIES**

TO THE HONORABLE COURT:

COME NOW Plaintiffs and Defendants (collectively, the “Parties”), through their respective counsel, and pursuant to Local Civ. Rule 7, respectfully request leave to file Replies in support of their respective Objections to Magistrate Judge’s Report and Recommendation (Dkt.

315, the “Report & Recommendation”), to file enlarged Joint Replies, and for an extension until May 7, 2025 to file all Replies. In support of this motion, the Parties state and pray as follows:

1. By Order entered on March 4, 2025, this Honorable Court granted the Parties’ *Joint Motion for Extension of Time to File Objections to Report and Recommendation and Responses Thereto, and for Leave to File Briefs in Excess of Page Limit*. (Dkt. 317, the “Order”).

2. The Order provided that the Parties’ Objections to the Report and Recommendation (the “Objections”) were due by March 21, 2025, that Responses to the Objections (the “Responses”) were due by April 11, 2025, and that “[t]he Court w[ould] entertain at the appropriate time requests for leave to file replies to the responses and to file replies in excess of the page limit under the local rules.” *Id.*

3. On March 21, 2025, Defendants filed their joint and individual Objections (Dkts. 319-321, 324-326, 328-332) and Plaintiffs filed Consolidated Objections (Dkt. 323).

4. On April 11, 2025, the Parties filed their respective joint and individual Responses. (Dkts. 334, 336-345 (Plaintiffs’ Responses); Dkts. 335, 346 (Defendants’ Responses)).

5. On April 23, 2025, and at Defendants’ request, the Court granted Defendants leave to file both joint and individual Replies by April 29, 2025, with joint replies limited to 15 pages and individual replies to 5 pages. (Dkt. 355)

6. Defendants and Plaintiffs now jointly move the Court to (a) grant leave and an extension for all parties to file replies by May 7, 2025, and (b) allow the parties to file joint replies not to exceed 20 pages and individual replies not to exceed 5 pages. The Parties reiterate that they will use their best efforts to consolidate their respective arguments in their Joint Replies.

WHEREFORE, the Parties hereby respectfully request that this Honorable Court enter an Order granting them: (1) leave to file respective Joint Replies not exceeding 20 pages each; (2) leave to file individual Replies not exceeding 5 pages; and (3) an extension until May 7, 2025 to

file their respective individual and joint Replies.

**RESPECTFULLY SUBMITTED**

In San Juan, Puerto Rico, this 24<sup>th</sup> day of April 2025.

**CERTIFICATE OF SERVICE:** I, Roberto C. Quiñones-Rivera, certify that, on the above date, I filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record registered in the system.

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